

INDICTMENT

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF KINGS

THE PEOPLE OF THE STATE OF NEW YORK

-against-

X: DAVID SAFIR (a.k.a. DIMA),
X: ALEXANDER HASELKORN,
X: ROBERTA HASELKORN (a.k.a ROBERTA
BERGMAN),
X: NADEZHDA URSULOVA, and
X: THERON GRINAGE (a.k.a. TIMOTHY
RUSSELL, a.k.a. MARCUS MONTGOMERY),

Defendants.

FILED:

INDICTMENT NO. 6641/2018

COUNTS

Penal Law § 470.15(1)(b)(ii)(A)(iii) MONEY LAUNDERING IN THE SECOND DEGREE
(1 Count) (Defendant David Safir)

Penal Law § 176.20 INSURANCE FRAUD IN THE THIRD DEGREE
(8 Counts) (Defendants David Safir, Alexander Haselkorn,
Roberta Haselkorn, and Nadezhda Ursulova)

Penal Law § 176.20 INSURANCE FRAUD IN THE THIRD DEGREE
(1 Count) (Defendants David Safir and
Nadezhda Ursulova)

Penal Law § 155.35(1) GRAND LARCENY IN THE THIRD DEGREE
(6 Counts) (Defendants David Safir, Alexander Haselkorn,
Roberta Haselkorn, and Nadezhda Ursulova)

Penal Law § 155.35(1) GRAND LARCENY IN THE THIRD DEGREE
(1 Count) (Defendants David Safir and
Nadezhda Ursulova)

Penal Law § 155.30(1)	GRAND LARCENY IN THE FOURTH DEGREE (2 Counts) (Defendants David Safir, Alexander Haselkorn, Roberta Haselkorn, and Nadezhda Ursulova)
Education Law § 6512(1)	UNAUTHORIZED PRACTICE OF A PROFESSION (7 Counts) (Defendant Roberta Haselkorn)
Education Law § 6512(1)	UNAUTHORIZED PRACTICE OF A PROFESSION (7 Counts) (Defendant Alexander Haselkorn)
Education Law § 6512(1)	UNAUTHORIZED PRACTICE OF A PROFESSION (7 Counts) (Defendant David Safir)
Penal Law § 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (16 counts) (Defendants David Safir, Alexander Haselkorn, and Roberta Haselkorn)
Penal Law § 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (2 counts) (Defendant David Safir)
Penal Law § 190.65(1)(b)	SCHEME TO DEFRAUD IN THE FIRST DEGREE (1 count) (All defendants)
Judiciary Law § 478	PRACTICING OR APPEARING AS ATTORNEY-AT- LAW WITHOUT BEING ADMITTED AND REGISTERED (2 counts) (Defendant Theron Grinage)

BARBARA D. UNDERWOOD
ATTORNEY GENERAL

A TRUE BILL

FOREPERSON

COUNT ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendant DAVID SAFIR (a.k.a. DIMA) of the crime of MONEY LAUNDERING IN THE SECOND DEGREE, in violation of Penal Law Section 470.15(1)(b)(ii)(A)(iii), committed as follows:

The defendant, from on or about July 17, 2016 to July 21, 2017, in the County of Kings and elsewhere, knowing that the property involved in one or more financial transactions; to wit, checks cashed at AVW Check Cashing, represented the proceeds of specified criminal conduct, conducted one or more such financial transactions which in fact involved the proceeds of specified criminal conduct, knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified criminal conduct, and the total value of the property involved in such financial transaction or transactions exceeded one hundred thousand dollars.

COUNT TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants, DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a. ROBERTA BERGMAN), and NADEZHDA URSULOVA, of the crime of INSURANCE FRAUD IN THE THIRD DEGREE, in violation of Penal Law Section 176.20, committed as follows:

The defendants, while acting in concert, from on or about May 25, 2017 to June 29, 2017, in the County of Kings and elsewhere, committed a fraudulent insurance act, and thereby wrongfully took, obtained, or withheld property, or attempted to wrongfully take, obtain, or

withhold property, with a value in excess of three thousand dollars from Met Life & Home Insurance Company (hereinafter "Met Life"), in regards to no-fault insurance claims for Witness One, a person whose identity is known to the Grand Jury ("Witness One").

COUNT THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants, DAVID SAFIR (a.k.a. DIMA), and NADEZHDA URSULOVA, of the crime of INSURANCE FRAUD IN THE THIRD DEGREE, in violation of Penal Law Section 176.20, committed as follows:

The defendants, while acting in concert, from on or about August 18, 2016 to December 2, 2016, in the County of Kings and elsewhere, committed a fraudulent insurance act, and thereby wrongfully took, obtained, or withheld property, or attempted to wrongfully take, obtain, or withhold property, with a value in excess of three thousand dollars from Government Employees Insurance Company (hereinafter "GEICO"), in regards to no-fault insurance claims for Witness Two, a person whose identity is known to the Grand Jury ("Witness Two").

COUNT FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants, DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA, of the crime of INSURANCE FRAUD IN THE THIRD DEGREE, in violation of Penal Law Section 176.20, committed as follows:

The defendants, while acting in concert, from on or about January 5, 2017 to July 13, 2017, in the County of Kings and elsewhere, committed a fraudulent insurance act, and thereby wrongfully took, obtained, or withheld property, or attempted to wrongfully take, obtain, or withhold property, with a value in excess of three thousand dollars from GEICO, in regards to no-fault insurance claims for Witness Three, a person whose identity is known to the Grand Jury ("Witness Three").

COUNT FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants, DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA, of the crime of INSURANCE FRAUD IN THE THIRD DEGREE, in violation of Penal Law Section 176.20, committed as follows:

The defendants, while acting in concert, from on or about December 29, 2016 to June 23, 2017, in the County of Kings and elsewhere, committed a fraudulent insurance act, and thereby wrongfully took, obtained, or withheld property, or attempted to wrongfully take, obtain or withhold property, with a value in excess of three thousand dollars from GEICO, in regards to no-fault insurance claims for Witness Four, a person whose identity is known to the Grand Jury ("Witness Four").

COUNT SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants, DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA, of the crime of INSURANCE FRAUD IN THE THIRD DEGREE, in violation of Penal Law Section 176.20, committed as follows:

The defendants, while acting in concert, from on or about June 8, 2017 to July 21, 2017, in the County of Kings and elsewhere, committed a fraudulent insurance act, and thereby wrongfully took, obtained, or withheld property, or attempted to wrongfully take, obtain, or withhold property, with a value in excess of three thousand dollars from Liberty Mutual Insurance Company ("Liberty Mutual"), in regards to no-fault insurance claims for Witness Five, a person whose identity is known to the Grand Jury ("Witness Five").

COUNT SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants, DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA, of the crime of INSURANCE FRAUD IN THE THIRD DEGREE, in violation of Penal Law Section 176.20, committed as follows:

The defendants, while acting in concert, from on or about June 8, 2017 to July 21, 2017, in the County of Kings and elsewhere, committed a fraudulent insurance act, and thereby wrongfully took, obtained, or withheld property, or attempted to wrongfully take, obtain, or withhold property, with a value in excess of three thousand dollars from Liberty Mutual, in regards to no-fault

insurance claims for Witness Six, a person whose identity is known to the Grand Jury ("Witness Six").

COUNT EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants, DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA, of the crime of INSURANCE FRAUD IN THE THIRD DEGREE, in violation of Penal Law Section 176.20, committed as follows:

The defendants, while acting in concert, from on or about March 23, 2017 to July 19, 2017 in the County of Kings and elsewhere, committed a fraudulent insurance act, and thereby wrongfully took, obtained, or withheld property, or attempted to wrongfully take, obtain, or withhold property, with a value in excess of three thousand dollars from GEICO, in regards to no-fault insurance claims for Witness Seven, a person whose identity is known to the Grand Jury ("Witness Seven").

COUNT NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants, DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA, of the crime of INSURANCE FRAUD IN THE THIRD DEGREE, in violation of Penal Law Section 176.20, committed as follows:

The defendants, while acting in concert, from on or about January 5, 2017 to June 14, 2017 in the County of Kings and elsewhere, committed a fraudulent insurance act, and thereby wrongfully took, obtained, or withheld property, or attempted to wrongfully take, obtain, or withhold property, with a value in excess of three thousand dollars from Amica Mutual Insurance Company ("Amica"), in regards to no-fault insurance claims for Witness Eight, a person whose identity is known to the Grand Jury ("Witness Eight").

COUNT TEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants, DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA, of the crime of INSURANCE FRAUD IN THE THIRD DEGREE, in violation of Penal Law Section 176.20, committed as follows:

The defendants, while acting in concert, from on or about March 9, 2017 to July 13, 2017, 2017 in the County of Kings and elsewhere, committed a fraudulent insurance act, and thereby wrongfully took, obtained, or withheld property, or attempted to wrongfully take, obtain, or withhold property, with a value in excess of three thousand dollars from GEICO, in regards to no-fault insurance claims for Witness Nine, a person whose identity is known to the Grand Jury ("Witness Nine").

COUNT ELEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Penal Law Section 155.35(1), committed as follows:

The defendants, while acting in concert, from on or about May 25, 2017 to June 29, 2017, in the County of Kings and elsewhere, stole property having a value in excess of three thousand dollars from Met Life & Home Insurance Company, in regards to no-fault insurance claims for Witness One.

COUNT TWELVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), and NADEZHDA URSULOVA of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Penal Law Section 155.35(1), committed as follows:

The defendants, while acting in concert, from on or about August 18, 2016 to December 2, 2016, in the County of Kings and elsewhere, stole property having a value in excess of three thousand dollars from GEICO, in regards to no-fault insurance claims for Witness Two.

COUNT THIRTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Penal Law Section 155.35(1), committed as follows:

The defendants, while acting in concert, from on or about January 5, 2017 to July 13, 2017, in the County of Kings and elsewhere, stole property having a value in excess of three thousand dollars from GEICO, in regards to no-fault insurance claims for Witness Three.

COUNT FOURTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Penal Law Section 155.35(1), committed as follows:

The defendants, while acting in concert, from on or about December 29, 2016 to June 23, 2017, in the County of Kings and elsewhere, stole property having a value in excess of three thousand dollars from GEICO, in regards to no-fault insurance claims for Witness Four.

COUNT FIFTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA of the crime of

GRAND LARCENY IN THE FOURTH DEGREE, in violation of Penal Law Section 155.30(1), committed as follows:

The defendants, while acting in concert, from on or about June 8, 2017 to July 21, 2017, in the County of Kings and elsewhere, stole property having a value in excess of one thousand dollars from Liberty Mutual, in regards to no-fault insurance claims for Witness Five.

COUNT SIXTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA of the crime of GRAND LARCENY IN THE FOURTH DEGREE, in violation of Penal Law Section 155.30(1), committed as follows:

The defendants, while acting in concert, from on or about June 8, 2017 to July 21, 2017, in the County of Kings and elsewhere, stole property having a value in excess of one thousand dollars from Liberty Mutual, in regards to no-fault insurance claims for Witness Six.

COUNT SEVENTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Penal Law Section 155.35(1), committed as follows:

The defendants, while acting in concert, from on or about March 23, 2017 to July 19, 2017, in the County of Kings and elsewhere, stole property having a value in excess of three thousand dollars from GEICO, in regards to no-fault insurance claims for Witness Seven.

COUNT EIGHTEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Penal Law Section 155.35(1), committed as follows:

The defendants, while acting in concert, from on or about January 5, 2017 to June 14, 2017, in the County of Kings and elsewhere, stole property having a value in excess of three thousand dollars from Amica, in regards to no-fault insurance claims for Witness Eight.

COUNT NINETEEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), and NADEZHDA URSULOVA of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Penal Law Section 155.35(1), committed as follows:

The defendants, while acting in concert, from on or about March 9, 2017 to July 13, 2017, in the County of Kings and elsewhere, stole property having a value in excess of three thousand dollars from GEICO, in regards to no-fault insurance claims for Witness Nine.

COUNT TWENTY

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about May 25, 2017 to June 29, 2017, in the County of Kings and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held herself out as being able to practice the profession of medicine, regarding Witness One.

COUNT TWENTY-ONE

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ALEXANDER HASELKORN, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about May 25, 2017 to June 29, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness One.

COUNT TWENTY-TWO

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, DAVID SAFIR (a.k.a. DIMA), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about May 25, 2017 to June 29, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness One.

COUNT TWENTY-THREE

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about January 5, 2017 to July 13, 2017, in the County of Kings and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held herself out as being able to practice the profession of medicine, regarding Witness Three.

COUNT TWENTY-FOUR

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ALEXANDER HASELKORN, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about January 5, 2017 to July 13, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Three.

COUNT TWENTY-FIVE

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, DAVID SAFIR (a.k.a. DIMA), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about January 5, 2017 to July 13, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Three.

COUNT TWENTY-SIX

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about February 2, 2017 to June 23, 2017, in the County of Kings and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held herself out as being able to practice the profession of medicine, regarding Witness Four.

COUNT TWENTY-SEVEN

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ALEXANDER HASELKORN, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about February 2, 2017 to June 23, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Four.

COUNT TWENTY-EIGHT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, DAVID SAFIR (a.k.a. DIMA), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about February 2, 2017 to June 23, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Four.

COUNT TWENTY-NINE

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about June 8, 2017 to July 21, 2017, in the County of Kings and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held herself out as being able to practice the profession of medicine, regarding Witness Five.

COUNT THIRTY

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ALEXANDER HASELKORN, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about June 8, 2017 to July 21, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Five.

COUNT THIRTY-ONE

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, DAVID SAFIR (a.k.a. DIMA), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about June 8, 2017 to July 21, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Five.

COUNT THIRTY-TWO

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ROBERTA HASELKORN (a.k.a. ROBERTA BERGMAN), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about March 23, 2017 to July 19, 2017, in the County of Kings and elsewhere, not being authorized to practice medicine under the Education Law, a profession

for which a license is a prerequisite, practiced or offered to practice or held herself out as being able to practice the profession of medicine, regarding Witness Seven.

COUNT THIRTY-THREE

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ALEXANDER HASELKORN, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about March 23, 2017 to July 19, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Seven.

COUNT THIRTY-FOUR

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, DAVID SAFIR (a.k.a. DIMA), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about March 23, 2017 to July 19, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Seven.

COUNT THIRTY-FIVE

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of

UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about January 5, 2017 to June 14, 2017, in the County of Kings and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held herself out as being able to practice the profession of medicine, regarding Witness Eight.

COUNT THIRTY-SIX

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ALEXANDER HASELKORN, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about January 5, 2017 to June 14, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Eight.

COUNT THIRTY-SEVEN

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, DAVID SAFIR (a.k.a. DIMA), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about January 5, 2017 to June 14, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Eight.

COUNT THIRTY-EIGHT

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about March 9, 2017 to July 13, 2017, in the County of Kings and elsewhere, not being authorized to practice medicine under the Education Law, a profession for which a license is a prerequisite, practiced or offered to practice or held herself out as being able to practice the profession of medicine, regarding Witness Nine.

COUNT THIRTY-NINE

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, ALEXANDER HASELKORN, of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about March 9, 2017 to July 13, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Nine.

COUNT FORTY

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant, DAVID SAFIR (a.k.a. DIMA), of the crime of UNAUTHORIZED PRACTICE OF A PROFESSION, in violation of Section 6512(1) of the Education Law, committed as follows:

The defendant, from on or about March 9, 2017 to July 13, 2017, in the County of Kings and elsewhere, aided or abetted an unlicensed person, to wit: Roberta Haselkorn, to practice the profession of medicine, a profession for which a license is a prerequisite, regarding Witness Nine.

COUNT FORTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about May 25, 2017, with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: a New York Motor Vehicle No-Fault Insurance Law Verification of Treatment by Attending Physician or Other Provider of Health Service form ("NF3 Form") and accompanying Initial Visit report submitted to Met Life for Witness One.

COUNT FORTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about June 30, 2017, with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 form and accompanying Medical Re-Evaluation report submitted to Met Life for Witness One.

COUNT FORTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendant DAVID SAFIR (a.k.a. DIMA) of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendant, in the County of Kings and elsewhere, on or about August 22, 2016, with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Initial Visit report submitted to GEICO for Witness Two.

COUNT FORTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendant DAVID SAFIR (a.k.a. DIMA) of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendant, in the County of Kings and elsewhere, on or about September 14, 2016 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an

enterprise, to wit: an NF3 Form and accompanying Report of Somatosensory Evoked Potentials (SSEP) from Lower Extremities submitted to GEICO for Witness Two.

COUNT FORTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about January 10, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Initial Visit report submitted to GEICO for Witness Three.

COUNT FORTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about April 18, 2017, with intent to defraud, including an intent to commit another crime or to aid or

conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Range of Motion Exam report submitted to GEICO for Witness Three.

COUNT FORTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about February 10, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Medical Re-Evaluation report submitted to GEICO for Witness Four.

COUNT FORTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about April 24, 2017, with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Medical Re-Evaluation report submitted to GEICO for Witness Four.

COUNT FORTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about June 14, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Initial Visit report submitted to Liberty Mutual for Witness Five.

COUNT FIFTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as

follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about June 16, 2017, with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Report of Somatosensory Evoked Potentials (SSEP) from Lower Extremities submitted to Liberty Mutual for Witness Five.

COUNT FIFTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about June 14, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Range of Motion Exam report submitted to Liberty Mutual for Witness Six.

COUNT FIFTY-TWO

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS

RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about July 7, 2017, with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Range of Motion Exam report submitted to Liberty Mutual for Witness Six.

COUNT FIFTY-THREE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a. ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about March 24, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Initial Visit report submitted to GEICO for Witness Seven.

COUNT FIFTY-FOUR

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA

HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about May 3, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Medical Re-Evaluation report submitted to GEICO for Witness Seven.

COUNT FIFTY-FIVE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about January 10, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Initial Visit report submitted to Amica for Witness Eight.

COUNT FIFTY-SIX

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about May 11, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Medical Re-Evaluation report submitted to Amica for Witness Eight.

COUNT FIFTY-SEVEN

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about March 16, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Initial Visit report submitted to GEICO for Witness Nine.

COUNT FIFTY-EIGHT

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, and ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Penal Law Section 175.10, committed as follows:

The defendants, while acting in concert, in the County of Kings and elsewhere, on or about June 20, 2017 with intent to defraud, including an intent to commit another crime or to aid or conceal the commission thereof, made or caused to be made a false entry in the business records of an enterprise, to wit: an NF3 Form and accompanying Medical Re-Evaluation report submitted to GEICO for Witness Nine.

COUNT FIFTY-NINE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendants DAVID SAFIR (a.k.a. DIMA), ALEXANDER HASELKORN, ROBERTA HASELKORN (a.k.a ROBERTA BERGMAN), NADEZHDA URSULOVA and TIMOTHY RUSSELL (a.k.a. THERON, a.k.a. MARCUS MONTGOMERY), of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Penal Law Section 190.65(1)(b), committed as follows:

The defendants, while acting in concert, during a period from about July 1, 2016 to July 31, 2017, in the County of Kings and elsewhere, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain property from

more than one person by false or fraudulent pretenses, representations, or promises, and so obtained property with a value in excess of one thousand dollars from one or more such persons.

COUNT SIXTY

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendant THERON GRINAGE (a.k.a. TIMOTHY RUSSELL, a.k.a. MARCUS MONTGOMERY), of the crime of PRACTICING OR APPEARING AS ATTORNEY-AT-LAW WITHOUT BEING ADMITTED AND REGISTERED, in violation of Section 478 of the Judiciary Law, committed as follows:

The defendant, on or about February 23, 2017 in the County of Kings and elsewhere, practiced or appeared as an attorney-at-law or as an attorney and counselor-at-law for a person other than himself in a court of record in this state, or furnished attorneys or counsel or an attorney and counsel to render legal services, or held himself out to the public as being entitled to practice law as aforesaid or in any other manner, or assumed to be an attorney or counselor-at-law, or assumed, used, or advertised the title of lawyer, or attorney and counselor-at-law, or attorney-at-law or counselor-at-law, or attorney, or counselor, or attorney and counselor, or equivalent terms in any language, in such manner as to convey the impression that he was a legal practitioner of law or in any manner to advertise that he either alone or together with any other persons or person had, owned, conducted or maintained a law office or law and collection office, or office of any kind for the practice of law, without having first been duly and regularly licensed and admitted to practice law in the courts of record of this state, and without having taken the constitutional oath.

COUNT SIXTY-ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this indictment, accuses the defendant THERON GRINAGE (a.k.a. TIMOTHY RUSSELL, a.k.a. MARCUS MONTGOMERY), of the crime of PRACTICING OR APPEARING AS ATTORNEY-AT-LAW WITHOUT BEING ADMITTED AND REGISTERED, in violation of Section 478 of the Judiciary Law, committed as follows:

The defendant, on or about March 6, 2017, in the County of Kings and elsewhere, practiced or appeared as an attorney-at-law or as an attorney and counselor-at-law for a person other than himself in a court of record in this state, or furnished attorneys or counsel or an attorney and counsel to render legal services, or held himself out to the public as being entitled to practice law as aforesaid or in any other manner, or assumed to be an attorney or counselor-at-law, or assumed, used, or advertised the title of lawyer, or attorney and counselor-at-law, or attorney-at-law or counselor-at-law, or attorney, or counselor, or attorney and counselor, or equivalent terms in any language, in such manner as to convey the impression that he was a legal practitioner of law or in any manner to advertise that he either alone or together with any other persons or person had, owned, conducted or maintained a law office or law and collection office, or office of any kind for the practice of law, without having first been duly and regularly licensed and admitted to practice law in the courts of record of this state, and without having taken the constitutional oath.

BARBARA D. UNDERWOOD
NEW YORK STATE
ATTORNEY GENERAL